

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**MAY 10 2017**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
ROBERT A. GJERTSON, )  
)  
Defendant. )

No

**4:17CR204 RLW**

**INFORMATION**

The United States Attorney charges that:

**COUNT I**

**[False Statements Relating to Health Care Matters]**

On or about September 7, 2012, the defendant,

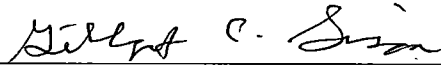
**ROBERT A. GJERTSON,**

knowingly and willfully made and used materially false writings and documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items, and services involving the Medicare program, a health care benefit program as defined in 18 U.S.C. § 24(b), in violation of 18 U.S.C. § 1035, in that the defendant created a progress note concerning patient K.H., a resident at Royal Oaks Residential Care in Sweet Springs, Missouri, that falsely stated that “[t]he patient or staff request treatment because the toenails are painful, ingrown and remain symptomatic even

when the resident is resting[]” when the defendant then and there well knew said statements and representations were false, fictitious, and fraudulent.

All in violation of 18 U.S.C. § 1035(a)(2) and 2.

CARRIE COSTANTIN  
Acting United States Attorney

  
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GILBERT C. SISON, #52346MO  
Assistant United States Attorney